

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:
Ralph Louis Lucik, Sr. : Case No.19-22989GLT
: Chapter 13
Debtor(s) :
Bayview Loan Servicing LLC :
: Related to Document #35
Movant(s) :
: Hearing Date
vs. :
Ralph Louis Lucik, Sr, and Ronda :
J. Winnecour, Trustee :
Respondent(s)

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,
respectfully represents the following:

1. This case was filed on July 30, 2019.
2. Ronda J. Winnecour is the Chapter 13 Standing Trustee in this case.
3. Debtor has paid to the Trustee three plan payments of \$2200.00 each.
4. A Meeting of Creditors has not yet taken place. Counsel for debtor has been ill.
5. However, undersigned counsel spoke with Debtor's counsel On November 26, 2019 and he indicated that he plans to attend the December 2, 2019 Meeting of Creditors with his client.
6. The Trustee expects to be able to recommend an interim confirmation order at that time.
7. Since debtor is remitting plan payments and expects to be able to disburse adequate protection payments to creditor in the near future, the Trustee requests that the Motion for Relief from Automatic Stay be denied without prejudice to refile if future circumstances warrant.

WHEREFORE, the Trustee respectfully requests that the motion is denied.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 11/26/19

by /s/ Jana S. Pail
Jana S. Pail - PA I.D. #88910
Attorney for Trustee
US Steel Tower – Suite 3250
600 Grant St.
Pittsburgh, PA 15219
(412) 471-5566
jpail@chapter13trusteewdpa.com

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th of November 2019, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh PA. 15222

James Warmbrodt, Esquire
KML Law Group, P.C.
701 Market Street Suite 5000
Philadelphia PA 19106

Ralph Louis Luick, Sr.
1287 Route 68
Rochester PA 15074

Robert B. Marcus, Esquire
436 Seventh Avenue
Suite 220
Koppers Building
Pittsburgh PA 15219

/s/Dianne DeFoor
Office of Chapter 13 Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
cmecf@chapter13trusteewdpa.com